No. 4:15-CV-00638-ALM-CAN

George Morris Plaintiff Vs. United Healthcare Insurance of Texas Defendant	§ § § § §	In the US District Court Eastern District of Texas Sherman Division

FILED
MAY 19 2016
Clerk, U.S. District Court
Texas Eastern

Plaintiff's Motion To Sanction Defendant

WHEREAS Plaintiff served discovery on Defendant on 4/11/2016,

WHEREAS Defendant acknowledged receipt of the discovery requests,

WHEREAS Defendant did not provide the requested answers to Plaintiff's Discovery by the end of the day on 5/12/2016,

WHEREAS the Federal Rules of Civil Procedure require a written response and opportunity to inspect the documents within 31 days,

WHEREAS more than the permissible 31 days have passed,

THEREFORE, PREMISES CONSIDERED, Plaintiff begs the Court to Sanction the Defendant for failure to make a timely response either by:

1) Striking the Defendant's pleadings and moving for Summary Judgment,

OR – FAILING THAT -
2) Compelling the Defendant to fully answer all Interrogatories and fulfill all Requests for Production without allowing any Objections,

OR – FAILING THAT -
3) Prohibitting the Defendant from taking any depositions or calling any witnesses because none were timely designated.

OR – FAILING THAT -
4) To take such other action(s) as the court feels justified to Sanction the Defendant in respect to this violation of deadlines.

Respectfully Submitted,

By: GM (5/13/2016)

George Morris
DNC.Violations@gmail.com
PO Box 864091, Plano TX 75086
972.943.9799

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of this document has been served on the parties listed below via e-mail and fax.

Andrew Jubinsky
Andy.jubinsky@figdav.com
Amber Reece
amber.reece@figdav.com
Telephone 214.939.2000
Fax 214.939.2090
901 Main St, Suite 3400, Dallas TX 75202